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Attorneys for Plaintiff, Will Loomis

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

WILL LOOMIS, an individual,

Plaintiff,

v.

Case No. CV12-5525 RSWL
(JEMx)

**DECLARATION OF EDGAR B.
PEASE III IN OPPOSITION OF
MOTION FOR SUMMARY
JUDGMENT**

JESSICA CORNISH, P/K/A JESSIE
J, an individual; UNIVERSAL
MUSIC GROUP, INC., a Delaware
corporation; LAVA RECORDS LLC, a
limited liability company;
UNIVERSAL REPUBLIC RECORDS,
business form unknown; and DOES
1-10 INCLUSIVE,

Defendants.

TO DEFENDANTS AND THEIR ATTORNEY(S) OF RECORD:

PLEASE TAKE NOTICE that Plaintiff, WILL LOOMIS, does hereby file the
attached Declaration of Edgar B. Pease III.

DECLARATION OF EDGAR B. PEASE III

I, EDGAR B. PEASE III, declare as follows:

1. I am the attorney of record for Plaintiff Will Loomis in this matter. This declaration is based on my personal knowledge, and if called as a witness I could and would competently testify to the matters herein.

2. I respectfully submit this declaration on personal knowledge as to matters stated therein and in support of Plaintiff's opposition to Defendant's motion for summary judgment.

3. Attached hereto as Exhibit "A" is a true and correct copy of the Certified copy of the Deposition of Kristin Loomis taken August 26, 2013.

4. Attached hereto as Exhibit "B" is a true and correct copy of the Certified copy of the selected Exhibits attached to the Deposition Transcript of Kristin Loomis taken August 26, 2013.

5. Attached hereto as Exhibit "C" is a true and correct copy of Plaintiff, Will Loomis' Expert Witness Designation FRCP 26 (2), et. sec. of Musicologist, Dr. David Stern; Written Report of Expert Dr. David Stern.

6. Attached hereto as Exhibit "D" is a true and correct copy of the Deposition Transcript and Exhibits attached thereto (2 Volumes).

7. Attached hereto as Exhibit "E" is a true and correct copy of the Confidential Telephonic Deposition of Jessica Cornish, taken September 10, 2013.

8. Attached hereto as Exhibit "F" is a true and correct copy of the Continued Video Taped Deposition of William Ray Loomis taken September 3, 2013.

1 9. Attached hereto as Exhibit "G" is a true and correct copy of the
2 Continued Video Taped Deposition of William Ray Loomis
3

4 I declare under penalty of perjury under the laws of the United States
5 of America that the foregoing is true and correct.
6

7 Executed this 4th day of October, 2013, at Encino, California.
8

9 

10 Edgar B. Pease III
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Exhibit “A”

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3

4 WILL LOOMIS, an individual,)
5)
6 Plaintiff,)
7)

CERTIFIED COPY

8 VS.) No. CIV12-5525
9)
10)

11 JESSICA CORNISH, P/K/A)
12 JESSIE J, an individual;)
13 UNIVERSAL MUSIC GROUP, Inc.,)
14 a Delaware Corporation; LAVA)
15 RECORDS, LLC, A limited)
16 liability company; UNIVERSAL)
17 REPUBLIC RECORDS, Business)
18 form unknown; DOES 1-10,)
19 inclusive,)
20)
21 Defendants.)
22)

23 DEPOSITION OF KRISTIN LOOMIS
24 Los Angeles, California
25 Monday, August 26, 2013

26 Job No: 65230
27 Reported by: NIKKI ROY
28 CSR No. 3052

1 Deposition of KRISTIN LOOMIS, taken before NIKKI
2 ROY, CSR No. 3052, a Certified Shorthand Reporter for
3 the State of California, commencing at 10:00 A.M., on
4 Monday, August 26, 2013, at 11377 West Olympic
5 Boulevard, Los Angeles, California on behalf of the
6 Defendants.

7
8
9 APPEARANCES OF COUNSEL:

10
11 FOR THE PLAINTIFF:

12 LAW OFFICES OF EDGAR B. PEASE III
13 BY: EDGAR B. PEASE III, Attorney at Law
14 16255 Ventura Boulevard
15 Encino, California 91436

16
17 FOR THE DEFENDANTS:

18 MITCHELL SILBERBERG & KNUPP
19 BY: JEFFREY M. MOVIT, Attorney at Law
20 12 East 49th Street
21 New York, New York 10017

22
23 ALSO PRESENT:

24 BRENT JORDAN, videographer
25

- Exhibit 14 Jerome Promotions Radio Report
Page.145;
- Exhibit 15 Jerome Promotion Radio Report
iradio LA, page.149;
- Exhibit 16 Jerome Promotion Radio Report
KFMI-FM, page 149;
- Exhibit 17 Jerome Promotion Radio Report
KLBQ-FIM, page 150;
- Exhibit 18 Jerome Promotion Radio Report
KQAD-AM, page. 150;
- Exhibit 19 Jerome Promotion Radio Report
KQCR-FM, page. 150;
- Exhibit 20 LexPop Jerome Promotion Radio
Report, page. 151;
- Exhibit 21 WELT-FM Jerome Promotion Radio
Report, page. 151;
- Exhibit 22 WMOA-AM Jerome Promotion Radio
Report, page. 151;
- Exhibit 23 WMQT-FM Jerome Promotions, Inc.
Spins Tracking System document,
Page. 151;
- Exhibit 24 Spins Tracking System document
sent July 27,2010, page. 152;
- Exhibit 25 E-mail chain, page 156;

Exhibit 26	E-mail chain, page. 176;
Exhibit 27	TapScan ReachMaster Schedule Analysis, page. 181;
Exhibit 28	E-mail chain, page. 183;
Exhibit 29	E-mail chain, page. 202;
Exhibit 30	E-mail chain, page. 202;
Exhibit 31	E-mail chain, page. 202;
Exhibit 32	E-mail chain, page. 203;
Exhibit 34	E-mail chain, page. 223;
Exhibit 35	E-mail chain, page. 226;
Exhibit 37	E-mail chain, page. 241;
Exhibit 38	E-mail chain, page. 248;
Exhibit 41	E-mail chain, page. 288;
Exhibit 42	Income and expense reports for Kings of Spain for the years 2008 through 2010 (Retained) 2008 through 2010 (Retained)

1 And, again, this is just to make sure that
2 there's no problems with your memory as far as the
3 testimony, you're not on any medication that
4 interferes with your memory in any way?

5 A. No.

6 Q. Okay. And you understand that you're
7 testifying under oath today of course?

8 A. Of course.

9 Q. Okay. Just for the record, can you please
10 give your address of residence?

11 A. Yes. It's 285 San Ysidro Road,
12 Santa Barbara, California.

13 Q. And are you currently employed?

14 A. I work non -- full time at HHV6 Foundation.
15 I'm the executive director.

16 Q. And can you please briefly explain what the
17 HHV6 Foundation is?

18 A. It's a scientific medical foundation. We
19 support research into a specific beta herpes virus
20 and the disease associations. We give medical
21 conferences, initiate collaborations and manage a
22 repository of research reagents.

23 Q. And how long -- what are your main job
24 responsibilities as executive director?

25 A. Well, I oversee the foundation, do

1 fundraising, manage the conference, manage the
2 repository, manage the newsletter, manage the
3 website.

4 Q. And how long have you been executive
5 director?

6 A. Since 2004.

7 Q. Okay. Is this a full-time job?

8 A. No, it's more than -- it's more like 60
9 hours a week.

10 Q. Do you -- is it fair to say that you do
11 not -- do you have any other employment currently
12 besides being executive director of the HHV6
13 Foundation?

14 A. No.

15 Q. Okay. Okay. Did you have any role in this
16 foundation prior to becoming an executive director?

17 A. No, I founded it. I cofounded it.

18 Q. Okay. And what, if anything, was your
19 employment prior to being the executive director of
20 this foundation?

21 A. I worked in publishing.

22 Q. And what was your job in publishing prior to
23 the HHV6 Foundation?

24 A. Well, let's see. I was -- I also did
25 acquisitions. I was circulation director of Esquire

1 Magazine. I worked in circulation at Time Magazine.

2 I was a vice president for acquisitions at Whitney
3 Communications. I did consulting for International
4 Herald Tribune and Time International.

5 Q. Let's go back to your education for a
6 moment. Are you a college graduate?

7 A. I am.

8 Q. Okay. And where did you graduate from
9 college?

10 A. Wellesley.

11 Q. Okay. And what year was that?

12 A. '75.

13 Q. Okay. After that did you begin working or
14 did you have more school?

15 A. I went to Harvard Business School.

16 Q. That's directly after Wellesley?

17 A. Uh-huh.

18 Q. Okay. And what year did you graduate
19 Harvard Business School?

20 A. '77.

21 Q. Okay. And what did you do after graduating
22 Harvard Business School?

23 A. I went to Time International.

24 MR. PEASE: Excuse me. Wait till he -- wait
25 till he finishes, and you did say "uh-huh" one time.

1 So I want to remind you to --

2 THE WITNESS: Okay.

3 MR. PEASE: -- use yes or no. And speak up
4 just a little bit, make sure the court reporter hears
5 you.

6 THE WITNESS: Okay.

7 BY MR. MOVIT:

8 Q. Okay. And what did you do at Time
9 International after graduating from Harvard Business
10 School?

11 A. I worked for Fortune in circulation and
12 promotion.

13 Q. Okay.

14 THE DEPOSITION OFFICER: I'm sorry. I
15 worked for --

16 THE WITNESS: Fortune Magazine in
17 circulation and promotion.

18 BY MR. MOVIT:

19 Q. In circulation and promotion. How long did
20 you have that job?

21 A. Less than two years.

22 Q. Okay. What was your next job after that?

23 A. Esquire Magazine.

24 Q. Okay. And what was that beginning?

25 A. Late '70s.

1 Q. Okay. And what was your title at Esquire
2 Magazine at that point?

3 A. [REDACTED]

4 Q. Okay. How long did you have that job?

5 A. Less than two years.

6 Q. Okay. And what was your next job after
7 that?

8 A. I did a start-up venture with Clay Felker.

9 Q. Could you spell Clay Felker, please.

10 A. C-l-a-y.

11 Q. Uh-huh.

12 A. F-e-l-k-e-r.

13 Q. Is that a person?

14 A. Uh-huh. He's a famous journalist.

15 Q. Okay. And what was this venture?

16 A. We were trying to start up a city newspaper,
17 to compete with New York Magazine.

18 Q. So this was in the city of New York?

19 A. Uh-huh.

20 Q. Okay. And when did this venture begin?

21 A. Late '70s, early '80s.

22 Q. And how long were you involved with this
23 venture?

24 A. Less than two years.

25 Q. Okay. Was the venture successful?

1 A. No.

2 Q. Okay. What was your next job?

3 A. I worked at Whitney Communications.

4 Q. Okay. At Whitney Communications?

5 A. Whitney.

6 Q. Okay. I would echo Mr. Pease's request that
7 you please speak up a little. Thank you.

8 And what did you do at Whitney
9 Communications?

10 A. I did acquisitions of small cable companies.

11 Q. And do you remember your title?

12 A. I was a vice president.

13 Q. Okay. And how long were you vice
14 president -- I'm sorry. Strike that.

15 What years were you, if you recall, vice
16 president at Whitney?

17 A. I don't recall exactly.

18 Q. Approximately?

19 A. Late '70s, early '80s.

20 Q. Okay. And what was your next job after
21 that?

22 A. I'm thinking. I moved to Hong Kong and I
23 worked for the International Herald Tribune and Time
24 International.

25 Q. Okay. And when did this begin?

1 A. Early '80s.

2 Q. Okay. Were you simultaneously working for
3 the International Herald Tribune and Time
4 International?

5 A. Yes.

6 Q. Okay. And what was your title?

7 A. Consultant.

8 Q. Okay. Did they have the same corporate
9 owner at that point?

10 A. No.

11 Q. Okay. So you were doing consulting work for
12 two separate clients, then?

13 A. Uh-huh.

14 Q. Okay. So you were an independent
15 consultant?

16 A. Uh-huh.

17 Q. Okay. And do you remember the approximate
18 years in which you were an independent consultant for
19 the IHT and Time International?

20 A. Early '80s.

21 Q. Okay. Do you remember how many years you
22 were an independent consultant for these two clients?

23 A. About two years.

24 Q. Okay. What was your next job after that?

25 A. I think I took a break after my -- I think I

1 took a break for a few years because of new children,
2 and then worked for Compu-Card International.

3 Q. Is that Copy Card?

4 A. Compu-Card.

5 Q. Okay. Could you please spell that.

6 A. I think that they shortened it to CUC. When
7 I started it was Compu-Card International and then it
8 became CUC International.

9 Q. Okay. Could you please -- do you recall how
10 Compu-Card is spelled?

11 A. C-o-m-p-u-c-a-r-d.

12 Q. Okay. Is the C in card capitalized?

13 A. Yes.

14 Q. Is that one word or two, Compu-Card?

15 A. I think they had hyphens.

16 Q. Okay. And do you recall the approximate
17 years in which you worked for Compu-Card
18 International or CUC?

19 A. Mid 80s.

20 Q. Okay. How many years approximately?

21 A. Two.

22 Q. Okay. Did you have a title there?

23 A. I was vice president.

24 Q. Okay. Did you have any other title there?

25 A. Not that I recall.

1 Q. When approximately was it originated,
2 Ms. Loomis, the account?

3 A. I believe it was 2006.

4 Q. Okay. And your son Will took over operating
5 that account when you resigned?

6 A. Uh-huh.

7 Q. "Yes"?

8 A. Yes.

9 Q. Yes, okay. Okay. When approximately in
10 2010 did you cease being involved in your words as a
11 volunteer with the band?

12 A. I can't recall exactly, but sometime between
13 October and November.

14 Q. Of 2010?

15 A. Uh-huh.

16 Q. Okay. When did you begin being involved
17 with the band?

18 A. When he was in third grade.

19 Q. When -- do you know when Loomis & the Lust
20 was founded?

21 A. I think the original band name was Kings of
22 Spain. Well, he had a few names, but Kings of Spain
23 was briefly the name of the band. I think that was
24 in 2006. And then I think Loomis & the Lust was the
25 new name beginning possibly in 2007, but I can't

1 recall exactly, but probably 2007.

2 MR. PEASE: Objection as to the scope. This
3 is Kings of Spain. Are you incorporating --
4 Christine Loomis -- these are questions for
5 Christine -- or Kristin Loomis, her deposition into
6 these questions, and then I won't have to ask for
7 this objection to scope going back to the third grade
8 because she's here as -- representing of 30(b)(6) of
9 Kings of Spain.

10 MR. MOVIT: I -- I'm going to -- let's move
11 on, please, or it's going to be a very long day.
12 Your objection, to the extent there was one in there,
13 is noted. Let's move on.

14 30(b) -- okay. So it's very clear, a
15 30(b)(6) witness can be testifying -- you know, can
16 testify as to personal knowledge and the knowledge of
17 the organization for whom the witness is testifying
18 on behalf of.

19 MR. PEASE: I'm aware of that.

20 MR. MOVIT: So I'm going to proceed on that
21 basis.

22 MR. PEASE: I'm aware of that.

23 BY MR. MOVIT:

24 Q. Okay. What were your -- what was your role
25 as a volunteer for Loomis & the Lust?

1 A. I assisted them with administrative matters
2 and tried to keep them organized. I helped them set
3 up their websites. I insisted that they keep
4 financial records, and that we set up a corporate
5 entity and that all income and expenses were run
6 through that, and that we filed tax returns.

7 I also arranged insurance for their band bus
8 and did what I could to help because they were
9 focused on music and did need some administrative
10 support, which I was able to offer.

11 Q. Okay. And the corporate entity that you
12 referred to in your answer, was that Kings of Spain,
13 Incorporated?

14 A. Yes. We set it up originally, I think,
15 because it was the first band name, and then we kept
16 that entity as the -- kind of the operating entity
17 and Loomis & the Lust became the band. But we -- we
18 kept the Kings of Spain, we had a checking account,
19 we -- I think we trademarked the name and set it up
20 as a corporation.

21 MR. MOVIT: I'd like to next mark exhibit --
22 are we up to 3 -- Exhibit 3.

23 (The document referred to was marked
24 by the CSR as Deposition Exhibit 3 for
25 identification and attached to the

1 A. No. But we've sent things to Rodney Jerkins
2 who was his associate.

3 Q. Okay. Step back. So let's first -- let's
4 break this down. First of all, I'm asking if it's
5 correct that you never sent anything directly to
6 Mr. Claude Kelly. Then we'll talk about indirectly.
7 But directly, is it correct, that you've never sent
8 anything directly to Mr. Claude Kelly?

9 A. Not directly but, yes, indirectly.

10 Q. Okay. Indirectly. Is it your contention
11 that you have sent anything indirectly to Mr. Claude
12 Kelly?

13 A. Yes. Indirectly through his associate
14 Rodney Jerkins.

15 Q. Okay. What do you contend that you -- well,
16 first of all, what did -- strike that.

17 What do you contend that you sent to
18 Mr. Jerkins?

19 A. Bright Red Chords.

20 Q. Okay. When did you send Bright Red Chords
21 to Mr. Jerkins?

22 A. At the New Music Festival.

23 Q. Okay. What is the New Music Festival?

24 A. It was a contest for emerging artists and --
25 with a \$25,000 prize and they won it -- Loomis & the

1 Lust won it, and Rodney was the -- Rodney was the --
2 was one of four judges, and he received Bright Red
3 Chords in advance, and he watched the production of
4 Bright Red Chords, and in fact expressed a lot of
5 enthusiasm about it in the ensuing discussion.

6 Q. When was this New Music Festival?

7 A. I'd have to get back to you with the exact
8 date, but I think it was -- well, it was 2009 or
9 2010.

10 Q. Okay. And is it your contention that
11 Mr. Jerkins was physically provided with a copy of
12 Bright Red Chords?

13 A. Yes.

14 Q. Okay. How do you know that?

15 A. Because the New Music Festival sent it to
16 each of the judges, and I know that because I
17 coordinated with them. And he also sat in the room
18 and listened to it, and I have a videotape of him
19 sitting in there with 800 people watching the Bright
20 Red Chords on the video and then praising it.

21 Q. Okay. And we're not speaking about
22 listening to the song right now. We're speaking
23 about physically being provided --

24 A. Uh-huh.

25 Q. -- with a copy of it.

1 A. He was.

2 Q. Okay.

3 A. He received a digital copy.

4 Q. How do you know he received a digital copy?

5 A. Because the leader, the manager of the New
6 Musical Seminar sent it to all four judges in
7 advance.

8 Q. How do you know the manager sent it?

9 A. Because I was informed of it. I may have
10 even been copied on the e-mail.

11 Q. Okay. You have not produced any such
12 e-mail --

13 A. I don't have access --

14 Q. -- have you?

15 A. -- to that account anymore, but I assume,
16 you know, it could be dug up.

17 Q. I'll represent that no such e-mail has been
18 produced.

19 A. Well, wait. How do you know it hasn't been?
20 I suspect it probably has.

21 Q. Because I've reviewed all 3,000 pages of
22 your production.

23 A. You have?

24 Q. Yes, I have. Yes, ma'am.

25 A. Okay. Well, I don't know that this fell

1 BY MR. MOVIT:

2 Q. Ms. Loomis, is it your testimony that the
3 video we just watched -- strike that.

4 Ms. Loomis, do you know who created -- who
5 was the videographer for the video we just watched?

6 A. I was.

7 Q. Do you know who edited the video?

8 A. Will did that edit. I probably have the
9 full tape.

10 Q. Not sure one way or the other?

11 A. I believe it's on my hard drive.

12 Q. But you haven't looked for it in responding
13 to the document request in this case; is that true?

14 A. No, because it didn't occur to me that it
15 would be relevant.

16 Q. Do you know who posted it on YouTube?

17 A. I assume Will did.

18 Q. Okay. But you're not for sure for sure?

19 A. No.

20 Q. Okay. Is it your testimony that the video
21 shows Rodney Jerkins at any point?

22 A. I'm 100 percent certain that that was Rodney
23 Jerkins on the panel, and that can be easily
24 verified. He was introduced. He was on all the
25 literature. He was in Billboard magazine as a

1 panelist. So, yes, that was Rodney Jerkins.

2 Q. Do you recall if Rodney Jerkins was not
3 present for any portion of the events set forth in
4 that video?

5 A. He was there the entire time when -- when
6 the music was -- by Loomis -- was played by Loomis &
7 the Lust, and he was there at the end.

8 MR. MOVIT: Okay. I'll just state for the
9 record that large portions of the dialogue on the
10 video were incomprehensible to my ears. Because I
11 know that we weren't doing a transcription of it, I
12 will say for the record that large portions of the
13 dialogue I could not discern.

14 I'll just make a statement that I am done
15 with asking questions for the day because of the
16 issues with potentially incomplete document
17 production. I, as a legal matter, as a technical
18 matter, am holding the deposition open.

19 I understand that the witness is going to
20 Europe for the rest of the period of discovery in
21 this case, so obviously that creates issues, but all
22 rights reserved.

23 And with that, to the extent that you're not
24 asking any questions today, Ed, I think we're done
25 for the day.

EXHIBIT “B”

EXHIBIT “14”

JEROME PROMOSTIONS RADIO REPORT

7/27/10 – 10/26/10

Jerome Promotions Radio Report
2535 Winthrop Way
Lawrenceville, GA 30044
770-982-7055
hitcd@bellsouth.net

Loomis and the Lust / "Bright Red Chords" / Kings of Spain Records
071910

July 27, 2010

New Adds

KFMI / Eureka, CA
KGY / Olympia, WA
KLBB / Eldorado, AR
KQCR / Hampton, IA
WIDE / Troy, NY Top 40 Internet
WJER / Dover, OH

Exhibit 14

K. Loomis
8/26/13
reporter: nikki roy
CSR No. 3052

LOOMIS 001762

Jerome Promotions Radio Report
2535 Winthrope Way
Lawrenceville, GA 30044
770-982-7055
hitcd@bellsouth.net

Loomis and the Lust / "Bright Red Chords" / Kings of Spain Records
071910

September 28, 2010

New Adds

KBHI / Cape Girardeau, MO
WYUL / Burlington, VT

<u>Airplay</u>	<u>Spins</u>
FM102 Internet / San Francisco, CA	7
I-Radio LA / Covina, CA Internet	90 stress trax
KCAJ / Roseau, MN	21 stress trax (getting good response)
KCHE FM / Cherokee, IA – stress trax	8
KFMI / Eureka, CA	14 stress trax
KGY / Olympia, WA	24
KIQX / Durango, CO	7
KIXY / San Angelo, TX **R&R Reporter	25
KKRB / Klamath Falls, OR	20
KLBQ / Eldorado, AR **R&R Reporter	45 stress trax
KQAD / Luverne, MN	drop, no response
KQCR / Hampton, IA	28 not much response
KREZ / Cape Girardeau, MO	9
KTRL / Stephenville, TX	8
KTRN / Pine Bluff, AR	5 no response
KUOO / Spirit Lake, IA	8
KURT / Stephenville, TX	8
KYFM / Bartlesville, OK	25
KZEW / Wheatland, WY	5

LOOMIS 001767

Lexpop / Lexington, KY	37
WELT / Swainsboro, GA	28
WGTA / Thomaston, GA	21
WIDE / Troy, NY Top 40 Internet	95
WJER / Dover, OH	20
WJTW / Marietta, OH	10
WKIB / Cape Girardeau, MO	9
WMOA / Marietta, OH	10 stress trax
WMQT / Marquette, MI	21
WOCO / Oconto, WI	11
WREZ / Paducah, KY	9

LOOMIS 001768

Jerome Promotions Radio Report
2535 Winthrope Way
Lawrenceville, GA 30044
770-982-7055
hitcd@bellsouth.net

Loomis and the Lust / "Bright Red Chords" / Kings of Spain Records
071910

October 12, 2010

New Adds

None

<u>Airplay</u>	<u>Spins</u>
FM102 Internet / San Francisco, CA	7
I-Radio LA / Covina, CA Internet	99 stress trax
KBHI / Cape Girardeau, MO	8
KCAJ / Roseau, MN	21 stress trax (getting good response)
KCHE FM / Cherokee, IA – stress trax	drop, no response
KFMI / Eureka, CA	14 stress trax
KGY / Olympia, WA	24 not much response
KIQX / Durango, CO	5 no response
KIXY / San Angelo, TX **R&R Reporter	25 no response
KKRB / Klamath Falls, OR	20
KLBQ / Eldorado, AR **R&R Reporter	45 stress trax #1
KQCR / Hampton, IA	drop, not enough response
KREZ / Cape Girardeau, MO	9
KTRL / Stephenville, TX	8
KUOO / Spirit Lake, IA	8
KURT / Stephenville, TX	8
KYFM / Bartlesville, OK	16 no response
KZEW / Wheatland, WY	5
Lexpop / Lexington, KY	37
WELT / Swainsboro, GA	drop, no response
WGTA / Thomaston, GA	21

LOOMIS 001765

WIDE / Troy, NY Top 40 Internet	90
WJER / Dover, OH	20
WJTW / Marietta, OH	10
WKIB / Cape Girardeau, MO	9
WMOA / Marietta, OH	10 no response
WMQT / Marquette, MI	22 no response
WOCO / Oconto, WI	11
WREZ / Paducah, KY	9
WYUL / Burlington, VT	17

LOOMIS 001766